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10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA – SANTA ROSA DIVISION
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13 In re:) Case No.: 18-10188
14) Chapter: 13
15 DAVID MENDOZA,)
16) Ref No. ALG-1
17 Debtor.)
18) **NOTICE OF DEBTOR’S REQUEST FOR**
19) **FORBEARANCE EXTENSION DUE TO**
20) **THE COVID-19 PANDEMIC**
21)
22)
23)

24 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
25 **JUDGE, THE DEBTOR, THE CHAPTER 13 TRUSTEE, THEIR COUNSEL OF**
26 **RECORD, IF ANY, AND ALL OTHER INTERESTED PARTIES:**

27 Quicken Loans, LLC fka Quicken Loans Inc. (“Creditor”), by and through undersigned
28 counsel, hereby submits Notice to the Court of the Debtor’s request for mortgage payment
forbearance extension based upon a material financial hardship caused by the COVID-19
pandemic.

1 The Debtor recently contacted Creditor requesting an extension of the forbearance period
2 of three months and has elected to not tender mortgage payments to Creditor that would come
3 due on the mortgage starting August 1, 2020 through October 31, 2020. Creditor holds a secured
4 interest in real property commonly known as 1566 Alegra St., Santa Rosa, CA 95403, as
5 evidenced by claim number 2 on the Court's claim register. Creditor, at this time, does not waive
6 any rights to collect the payments that come due during the forbearance period. If the Debtor
7 desires to modify the length of the forbearance period or make arrangements to care for the
8 forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those
9 requests through undersigned counsel.
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12 Per the request, Debtor will resume mortgage payments beginning November 1, 2020 and
13 will be required to cure the delinquency created by the forbearance period (hereinafter
14 "forbearance arrears") by either paying off the loan or reinstating the loan in full. Creditor has
15 retained undersigned counsel to seek an agreement with Debtor regarding the cure of the
16 forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make
17 arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from
18 the automatic stay upon expiration of the forbearance period.
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20 Respectfully submitted,

21 WRIGHT, FINLAY & ZAK, LLP
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23 Dated: August 10, 2020

By: /s/ Arnold L. Graff, Esq.

Arnold L. Graff, Esq.

Attorneys for Creditor, Quicken Loans, LLC
fka Quicken Loans Inc.
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On August 10, 2020, I served the foregoing documents described as ***NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE EXTENSION DUE TO THE COVID-19 PANDEMIC***, on the following individuals by depositing true copies thereof in the United States first class mail at Newport Beach, California, enclosed in a sealed envelope, with postage paid, addressed as follows:

☒ (BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Newport Beach, California. I am readily familiar with the firm's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service pursuant to which practice the correspondence is deposited with the U.S. Postal Service the same day in the ordinary course of business.

☐ (BY NORCO OVERNITE - NEXT DAY DELIVERY) I placed true and correct copies of thereof enclosed in a package designated by Norco Overnight with the delivery fees provided for.

☒ (BY ELECTRONIC SERVICE) Pursuant to CM/ECF System, registration as a CM/ECF user constitutes consent to electronic service through the Court's transmission facilities. The Court's CM/ECF systems sends an e-mail notification of the filing to the parties and counsel of record listed above who are registered with the Court's EC/ECF system.

☐ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

/s/ Erica Baker
ERICA BAKER

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SERVICE LIST
In re David Mendoza
Bankruptcy Case No.: 18-10188

PARTIES SERVED BY ECF ELECTRONIC MAIL:

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